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ABSTRACT

The central purpose of this paper is to describe the origins, assumptions, approaches, and problems of the major evaluation efforts relating to vocational education specified in the Educational Amendments of 1976. The first of five chapters provides background information on vocational education, evaluation, and the Education Amendments of 1976. The second chapter gives an overview of seven groups which were given specific evaluation responsibilities in the 1976 Amendments. Included in these groups are the state boards of vocational education, state advisory councils for vocational education, and the U.S. Office of Education's Bureau of Occupational and Adult Education. Information on each group is organized into five parts: (1) legislative basis, (2) assumptions/expectations, (3) approach/activities, (4) problems, and (5) comments. In addition, this chapter reviews groups with responsibilities related to evaluation. Among the groups included in this section are the National Center for Research in Vocational Education and the General Accounting Office. Impressions, reflections, and observations are presented in the next chapter, followed by a summary chapter. Material prepared at the conference on the evaluation of vocational education is presented in an epilogue. (LRA)

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Research and Development Series No. 173

EVALUATION OF VOCATIONAL EDUCATION: ROLES, RESPONSIBILITIES, AND RESPONSES OF STATE AND FEDERAL AGENCIES

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U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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U. S. DEPARTMENT OF
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FOREWORD

The National Center has consistently endorsed and promoted evaluations of vocational education as essential to improving programs and maintaining accountability. Despite this commitment to evaluation, there has been a continuing concern that various evaluation activities may overlap, duplicate or even contradict each other. Thus, as an initial effort toward defining and clarifying roles and responsibilities in evaluating vocational education, the National Center asked the Education Commission of the States (ECS) to undertake this study. The central purpose of this paper is to describe the origins, assumptions, approaches, and problems of the major evaluation efforts relating to vocational education. The study describes over twenty evaluations being undertaken by twelve agencies and institutions. It is hoped that this document will enable the reader to understand the range of evaluation efforts being undertaken.

As a subcontractor, the ECS was encouraged to express its views as a result of the investigation it had undertaken. The views do not necessarily reflect the views of the National Center or the Bureau of Occupational and Adult Education, the U. S. Office of Education.

Sincere appreciation is extended to Sylvia D. Parker of ECS for the successful accomplishment of a difficult task under ever present resource and time constraints. Grateful acknowledgements are offered to her ECS colleagues Carol Anderson and Gene Hensley for their assistance. Also, for their efforts in initiating and monitoring the study, appreciation is extended to N. L. McCaslin, William Stevenson, and Jerry Walker of the National Center. Finally, appreciation is extended to the Bureau of Occupational and Adult Education, U. S. Office of Education for their support of this effort through the contract for the National Center for Research in Vocational Education.

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INTPODUCTION

The Education Amendments of 1976 (P.L. 94-482) were very prescriptive with regard to the evaluation of vocational education. State boards of vocational education in each state were directed to evaluate the effectiveness of all their programs assisted with funds under this act, and state advisory councils were directed to monitor the evaluations done by the state boards.[1] The U. S. Office of Education was mandated to conduct a review of all the states' programs, and the National Advisory Council for Vocational Education was instructed to review the federal level administration and operation of vocational education programs including the reviews of the states' programs. Many other evaluation activities were stated or implied throughout the amendments, as well as various planning, accountability, and data collection provisions that were all interrelated.

With the idea that the evaluation requirements in the legislation are numerous and the purposes may not be clearly understood, this study was concerned with providing an overview of the requirements and the various agencies charged with these evaluation responsibilities. This was done so that vocational educators at the local, state, and federal levels might have a better understanding of who is requiring what of whom.

There are many different meanings for the word *evaluation*. It is defined in this paper as any on-going effort that elicits information about vocational education for the purpose of documenting, improving, clarifying, understanding, or determining the worth of vocational education.

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[1]The term *state board (of vocational education)* is used in this paper in the generic sense as the term is used in the Vocational Education Act, Section 104. A *state board* is the sole state agency or board responsible for the administration of vocational education programs funded under this act. Since the governance structure varies from state to state, some state boards are separate entities while others are part of public instruction or other state departments.

This report focuses on those evaluation activities specified in the Education Amendments of 1976. An overview of the major groups and their activities in evaluation is presented. The study was not an evaluation of evaluation efforts but an analysis of these evaluation efforts in order to provide an objective overview of what was taking place in the fall of 1978.

The Education Commission of the States (ECS), in cooperation with the National Center for Research in Vocational Education, prepared this paper. The Commission became involved in the project because of the concern expressed by states about the many intertwining federal evaluation requirements. Improved federal-state relations in all areas of education is a major emphasis of the Commission. This project was seen as one that would provide an opportunity to help further those relationships. The area of evaluation is one of the primary responsibilities of the National Center. A description of evaluation responsibilities assigned to the various agencies was seen as a valuable aid to state and local agencies as they work to carry out more effectively their evaluation responsibilities. Work was begun on the paper in June 1978, and completed in January of 1979.

In order to describe the present range of evaluation activities, it was necessary to first review the evaluation provisions of P. L. 94-482 and the related regulations and then to identify the different groups assigned responsibility for evaluation. An information-gathering period followed. All of the state directors of vocational education were contacted for materials on their evaluation activities. After analyzing those materials, extended telephone conversations were held with state directors and/or key state staff with evaluation responsibilities and some executive directors of state advisory councils. The director and/or staff personnel for each of the other groups with specific and related evaluation responsibilities mentioned in this report were also contacted by telephone or in person. Over 150 telephone calls were made to gather and verify information. No attempt was made to conduct a survey *per se*; consequently no survey forms were used, nor were sources asked the same questions. All sources were assured of confidentiality and are not identified in this paper. In all cases though, information came from knowledgeable people in responsible positions.

In order to present a section on the Congressional intent behind the activities of each group with specific evaluation responsibilities, information was gleaned from the Congressional Record, committee and hearing reports, and comments from those who helped author the amendments.

In January 1979, a conference on the evaluation of vocational education was held in which a draft of this paper was presented for discussion, and recommendations were made related to the evaluation of vocational education. Participants in the conference included four state evaluation coordinators, three state administrators, four executive directors of state advisory councils, a member of the National Advisory Council for Vocational Education, and an executive director of the state occupational information coordinating committee. Two staff members of the Education Commission of the States and two representatives of the National Center for Research in Vocational Education also participated in the discussion. In addition to providing feedback on the usefulness and accuracy of the report the group prepared a statement of concerns and needs for vocational education evaluation.

There are five parts to this report. Background information on vocational education, evaluation and the Education Amendments of 1976 is provided in the first section. An overview of evaluations and some other related reviews, studies, and services. The information on each of the on-going evaluations is organized in five parts: (1) legislative basis for the activity, (2) assumptions and/or expectations behind the legislation and the evaluation activity, (3) approach/activities (what the group is actually doing), (4) principal problems, if any, and (5) comments. Impressions, reflections, and observations are presented in the next section followed by a summary. The material prepared at the conference on the evaluation of vocational education is presented as an epilogue.

This report was developed with the expectation that information of this type will help improve vocational education policies and programs. While much more needs to be done in the area of evaluation of vocational education, the information in this report represents an important step towards becoming more informed about vocational education evaluation.

CHAPTER I

BACKGROUND

In 1917, the Smith-Hughes Vocational Education Act passed following over ten years of lobbying and deliberation. This law reflected the times: concern with the opportunities for the sons and daughters of working people and farmers, few of whom would go on to college or university, or even finish high school; concern with youth unemployment and urban crime; concern with the industrial and agricultural production superiority of the German Kingdom of Bavaria; concern that academically oriented schools could not respond to the increased demand for trained industrial and technical workers brought about by rapid industrialization; concern that schools, if left to their own, would not respond to the need for education for work.[1] Congress thus passed the act to encourage the nation's schools to include preparing students for earning a living as an integral part of their mission. This was landmark legislation that pointed toward a major federal role in education.

Some states such as Massachusetts and some cities had already developed systems of free industrial education. Within a year of the passage of the Smith-Hughes Vocational Education Act, all the states had formally accepted the act and programs began springing up for agricultural, trade and industrial, and home economics training. Over the years, more occupational categories for training were added and federal authorization levels and state and local expenditures were gradually increased.

The Vocational Education Act (VEA) of 1963 brought a change in goals, an expanded role, and increased federal funding. Reflection on the 1963 Act by Evans in a report on the 1968 Amendments stated that the act "focused on the people who needed

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1 Albert H. Quie, "Education for Work - A National Perspective" (Speech delivered at the Bicentennial Conference on Vocational Education sponsored by the National Advisory Council on Vocational Education, in Minneapolis, Minnesota, October 1976).

skills rather than the occupations which needed people."[2] Thus, instead of just providing training in selected occupations, vocational education was to maintain, extend, and improve existing programs and develop new programs so that persons of all ages in all communities would have ready access to high quality training or retraining. Vocational education was also to become more responsive to people with special difficulties that prevented them from succeeding in regular vocational programs. Development of human potential and long term employment were the newly expressed concerns.

In 1968, the amendments to the Vocational Education Act emphasized the need to offer training that was more responsive to the needs of people and the changing labor market. Provisions for categorical funding by service areas was not the approach taken in this legislation. Funds were earmarked for training certain groups including the disadvantaged and handicapped, and postsecondary students. Requirements for strengthened planning and evaluation were included. State advisory councils for each state were also required.

Finally, in 1976, after two General Accounting Office reports on vocational education and two years of Congressional hearings, the Education Amendments of 1976 were passed. As might be expected in the nearly sixty years since the Smith-Hughes Act, the concerns behind the legislation had changed somewhat. In 1976, youth unemployment was still a major concern. But inflation had made the need to account for every federal dollar spent of major importance. Local and state education agencies had responded to the need for vocational training, and by 1974 state and local expenditures for vocational education had reached nearly $3 billion, which was more than 86 percent of the total. There was clearly no need to worry about the public schools' willingness to provide vocational education, but there was still concern that special sub-populations did not have equal access to training. The role of women in our society and the quest for equality was an important factor causing the Congress to ask if vocational education could help change the biases and stereotyping of society? The findings of the Commission on National Aid to Vocational Education in 1914 that "vocational training was imperative to prevent the waste of the nation's

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[2] Rupert N. Evans et al., *Education for Employment: The Background and Potential of the 1968 Vocational Education Amendments* (Ann Arbor, Michigan: Institute of Labor and Industrial Relations, 1969), p. 8.

human and natural resources, to democratize education, and to enhance standards of living and quash social unrest"[3] were still surprisingly pertinent in 1976.

This brief history of federal legislation does not, of course, say much about what vocational education is. People have different views of vocational education. There are those who dismiss vocational education as education only for the sons of farmers. Others condemn the few proprietary schools that once offered training to unsuspecting students for non-existent jobs, and they suspect that all vocational education must be like that. Still others think that vocational education is a tracking system for the disadvantaged and minorities. And there are those who think that vocational education was the best and only good thing they ever got out of school.

The federal legislation defines the term ***vocational education*** as ***organized*** *educational programs which are directly related to the preparation of individuals for paid or unpaid employment, or for additional preparation for a career requiring other than a baccalaureate or advanced degree.*[4] Vocational education is, in fact, a large, diffuse, complex, multi-billion dollar enterprise that provides work-related training to children and adults across the country. Courses are offered in everything from aviation electronics to X-ray technology. Because vocational education is part of the education system, it has been designed to be responsive primarily to local needs. Its governance, appearance and efficacy are not exactly alike in any two states. From the national level, vocational education is also seen as an important factor in national human resources, economic and social policies. Vocational education is caught between the world of education and work and sometimes finds difficulty in being accepted by either. It is sometimes regarded as a stepchild and is often expected to live up to the conflicting expectations and goals of different groups.

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[3] ***A Program*** *Review of Secondary Vocational Education in Ohio:* ***Job*** *Placement and State Funding* (Prepared by the Ohio Legislative Service Commission, Staff Research Report No. 126, Columbus, Ohio, April 1978) p.3. referenced from J. Chester Swanson, *Development of Federal Legislation for Vocational Education* (Chicago, 1966), p. 35.

[4] U.S. Congress, *A Compilation of Federal Education Laws as Amended Through June 30, 1977,* Vocational Education Act, prepared for the use of the House Committee on Education & Labor and the Senate Committee on Human Resources (Washington: U.S. Government Printing Office, 1977), p. 639.

During the weeks of hearings held by the Congressional subcommittee on various proposals for the Education Amendments of 1976, it was demonstrated that vocational education had made tremendous progress since 1963. Whenever there are expectations there are of course disappointments. There were many who felt that much more could be done, that vocational education programs must improve and progress with the times. Some individuals were disappointed that the 1968 amendments and the increased emphasis on evaluation and planning had not resulted in even better vocational education. There still was too little good information available that would facilitate decision-making for the future; in addition, there was little hard information that justified confident judgments about the effectiveness of past Congressional decisions. The question remained as to whether vocational education could definitively respond to and have an impact on prevailing economic and social needs.

The amendments that were passed provided a statement of what Congress felt vocational education must become: (1) more responsive to the labor market, (2) more accountable for how federal dollars are spent, (3) more open to special subpopulations--women, minorities, handicapped, disadvantaged, people with limited-English speaking ability, displaced homemakers, and (4) less sex biased and stereotyped. Programs were to improve through an increased emphasis on planning and evaluation.

Requirements for evaluation and accountability were inserted throughout the legislation and reflected the Congressional belief that they should provide encouragement to the Executive Branch; and state and local agencies in order to change and review vocational education. During the Congressional hearings, questions and criticisms had been raised with regard to the federal administration of and states' compliance with various requirements in the Vocational Education Act.[5]

In retrospect, some of the requirements seem necessary, some duplicative, and still others contradictory. For example, in seeking to have vocational education become more responsive to the labor market, Congress recognized that better labor market information was necessary and thus provided for national and state occupational information coordinating committees

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[5] U.S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H.R. 12835, pp. 27-29.

(NOICC and SOICC's). Programs which purported to impart entry level job skills would be evaluated annually by using data collected by sampling techniques. Completers and leavers of vocational programs would thus be followed-up and that information would be fed through the vocational education data system (VEDS) into the state and national occupational information coordinating committees for a better picture of the demand for and supply of workers. Employers of former vocational education students would be surveyed to get a qualitative assessment of the training being offered. It was also assumed that a better planning process would facilitate responsiveness to the labor market; consequently, state boards of vocational education were required to work with state and local advisory councils and the public in developing plans for program and service offerings. A system of checks and balances was introduced when Congress mandated that the plans must be: (1) reviewed by the state advisory councils and others for assurances, (2) reviewed and approved by the U.S. Office of Education, (3) used as one of the bases for evaluation by the Bureau of Occupational and Adult Education's Management Evaluation Review for Compliance and Quality (MERC-Q), and (4) used as the basis of the state boards' annual program plans and accountability reports. The need for greater cooperation and coordination with other training programs was also viewed as necessary and was partially addressed through coordination requirements placed on the state occupational information coordinating committees, although Congress did not want to interfere in decisions on who should offer what courses. Congress addressed many issues related to the ability of vocational education to be responsive to the labor market, but they did not fully address the need for flexibility. Thus, several questions remain: is it possible for an institution, in this case education, which takes a great deal of lead time to develop and implement programs, to show real responsiveness in the short run? Are the expectations for vocational education realistic and how will vocational educators know when and if they are being successful?

This example shows in a simple way the increased emphasis on and interrelationship of evaluation, accountability, and planning. Congress seems to have had the best interests of vocational education at heart when members prepared these comprehensive amendments. They clearly felt that it was necessary not only to delineate evaluation requirements but also to try to ensure that evaluation data would be used for planning, improvement and redirection.[6]

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[6] Lois-ellin Datta, "Better Luck this Time: From Federal Legislation to Practice in Evaluating Vocational Education", in *Handbook of Vocational Education Evaluation*, ed. Theodore Abramson et al. (Beverly Hills, CA: Sage Publications, Inc., forthcoming).

The fact that Congress has mandated numerous evaluations, greater accountability and increased planning and cooperation does not mean that programs have automatically improved at the local level. Vocational education is part of the public school enterprise and thus the responsibility of state and local governments which have their own purposes, administrative structures, and legal and financial constraints. Since programs are designed to be responsive to local needs, there are those who resist mandated evaluations and standardized reports not because they do not want to be evaluated or held accountable, but because they feel it would be inappropriate to compare programs within a school or from school to school let alone from state to state. Some are reluctant to spend precious program time gathering data that do not seem immediately useful simply to comply with requests. Some state boards feel they lack the authority to enforce local compliance. Others have neither the staff nor finances needed to bring about the desired changes.

We do not, in fact, know the actual extent to which federally legislated evaluation requirements can bring about state and local adoptions of improved programs and practices, nor are the motivations for state and local compliance with the evaluation requirements in the Amendments of 1976 altogether clear. Walker contends that:

> Like any other sector of education, state and local vocational education administrators act on (or react to) legislated evaluation requirements in terms of their perceptions of the sanctions to be applied if they don't comply, the utility to them if they do comply, and the level of resources (that must be expended in order) to comply. If those with the decision and authority prerogatives see the sanctions as high, the utility as high and the resources as low, it is very likely that compliance will be full and enthusiastic. Similarly, if the perceived pattern is one of low sanctions, low utility and high resources, one would expect non- or only ritualistic compliance.[7]

The full spectrum of perceptions appears to be evident in vocational education's response to the evaluation requirements specified in this act.

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[7] Jerry P. Walker, *Federal Evaluation Requirements for Educational Programs: Conditions and Consequences*, (Draft Manuscript, Fort Collins, Co., 1978).

The primary purpose of the evaluation requirements as intended by Congress is *to try to give local people and state administrators an opportunity to learn how their programs are operating and to help them improve those programs.*[8] Congress does not want evaluations that only produce national data that may be useful to them and no one else.

Evaluation, then, has many roles as specified in the Education Amendments of 1976. It is to be used to improve programs at the local level and to feed into policy decisions at the national level; it is to aid in making agencies at all levels more accountable; it is to ensure that certain important issues are addressed. All of this in an atmosphere where there is lack of agreement on what constitutes success in vocational education and even less agreement on acceptable levels of failure.

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[8] John F. Jennings, "Evaluating Vocational Education: A Congressional Perspective" (Speech delivered at the National Conference on Outcome Measures for Vocational Education sponsored by the National Center for Research in Vocational Education and funded by the National Institute of Education, in Louisville, Kentucky, August 1978).

CHAPTER II

OVERVIEW OF EVALUATION ACTIVITIES

The evaluation provisions in the Education Amendments of 1976 came in response to the need for more and better information on the quality and effectiveness of vocational education programs. Testimony before the Committee on Education and Labor prior to the enactment of the bill indicated that *improvements must come in the areas of planning, accountability, data collection and use, and evaluation and follow-up.*[9] While this paper is primarily concerned with evaluation, all of these areas are interrelated and interconnected in both the legislation and the paper.

This section focuses on the groups with specific evaluation responsibilities and those with responsibilities related to evaluation. After months of analyzing documents and making numerous telephone calls, this section was written to provide a general overview of evaluation activities. It should be viewed rather like a snapshot taken with a camera which gives the general picture, but the detail is not great and almost assuredly someone has been cut out of the scene. Detail was exchanged for brevity, and those in need of more extensive information may find, in addition to other reports, the National Institute of Education's recent state of the art report[10] and the National Advisory Council on Vocational Education's annual overview of state reports, useful.[11]

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9 U. S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H.R. 12835, p. 16.

10 *State of the Art Review of Evaluation Procedures in Vocational Education*, (Prepared by CRC Education and Human Development, Inc. for the National Institute of Education, November, 1978).

11 *Overview, 1976 Annual Evaluation Reports, State Advisory Councils on Vocational Education*, (Compiled by the National Advisory Council on Vocational Education, Washington, D. C., July 1977).

Groups with Specific Evaluation Responsibilities

Seven different groups were given very explicit evaluation responsibilities in the 1976 Amendments: (1) the state boards of vocational education, (2) the state advisory councils for vocational education, (3) the National Advisory Council for Vocational Education, (4) the U. S. Office of Education's Bureau of Occupational and Adult Education, (5) the National Institute of Education, (6) the National Center for Education Statistics, and (7) the U. S. Office of Education's Office of Evaluation and Dissemination (formerly referred to as the Office of Planning, Budgeting, and Evaluation).

While representatives of all the above groups were contacted for information, it was not the intention of this project to conduct a survey of all available sources. An effort was made to contact as many knowledgeable people as possible in the limited time available, and interviews were conducted with more than ninety people in responsible positions.[12]

The Vocational Education Act as amended and related rules and regulations (when they expand rather than simply repeat) are cited for each group's activities in order to show what each group is charged with doing. *Assumptions/expectations* behind the legislation and the evaluation activity are then discussed in order to better understand the Congressional intent and the perceived utility of the information produced through the evaluation. The part entitled *approach/activities* gives an overview of what the groups were actually doing in the fall of 1978. Perceived and anticipated *problems* are also included. The *comments* are those of the author based on information from numerous sources.

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[12] As stated in the introduction, sources were assured of confidentiality and are not identified in this report. The author appreciates the candor with which issues were discussed in an open dialogue manner and a sincere effort has been made to present the information responsibly.

State Boards for Vocational Education

Legislative basis.

Sec. 112 (b)(1) In order for the States to assist local educational agencies and other recipients of funds in operating the best possible programs of vocational education--
(A) each State shall, during the five-year period of the State plan, evaluate the effectiveness of each program within the State being assisted with funds available under this Act; and the results of these evaluations shall be used to revise the State's programs, and shall be made readily available to the State advisory council and
(B) each State shall evaluate, by using data collected, wherever possible, by statistically valid sampling techniques, each such program within the State which purports to impart entry level job skills according to the extent to which program completers and leavers--

(i) find employment in occupations related to their training, and
(ii) are considered by their employers to be well-trained and prepared for employment,

except that in no case can pursuit of additional education or training by program completers or leavers be considered negatively in these evaluations.

Regulations Implementing Sec. 112 (b)(1)(A):

104.402 . . . These evaluations shall be in terms of:

(a) Planning and operational processes, such as:
(1) Quality and availability of instructional offerings;
(2) Guidance, counseling, and placement and follow-up services;
(3) Capacity and condition of facilities and equipment;
(4) Employer participation in cooperative programs of vocational education;
(5) Teacher/pupil ratios; and
(6) Teacher qualifications.

(b) Results of student achievement as measured, for example, by:
(1) Standard occupational proficiency measures;
(2) Criterion referenced tests; and
(3) Other examinations of students' skills, knowledge, attitudes, and readiness for entering employment successfully.

(c) Results of student employment success as measured,

for example, by:
(1) Rates of employment and unemployment;
(2) Wage rates;
(3) Duration of employment; and
(4) Employer satisfaction with performance of vocational education students as compared with performance of persons who have not had vocational education.

(d) The results of additional services as measured by the suggested criteria under paragraphs (a), (b) and (c) of this section, that the State provides under the Act to these special populations:
(1) Women;
(2) Members of minority groups;
(3) Handicapped persons;
(4) Disadvantaged persons; and
(5) Persons of limited English-speaking ability.

Regulations implementing Sec. 112 (b)(1)(B):

104.404 Special data on completers and leavers . . .
(d) For the purposes of this section, a State shall report separately on program completers and program leavers in accordance with the survey instructions and sampling standards to be provided by the National Center for Education Statistics, HEW . . .
(f) The evaluation data on completers and leavers shall be collected at a date to be specified by the National Center for Education Statistics, HEW.

Assumptions/expectations. Congress in specifying the two evaluations listed above -- (1) systematic evaluations of all programs within a certain time, and (2) periodic reviews of programs to determine their effectiveness by following up students and their success in getting jobs--was responding to one of the greatest needs and greatest failings as perceived by witnesses who testified during committee hearings held prior to the enactment of the Education Amendments of 1976. Congress wanted states to increase program follow-ups and planning in order to become more responsive to labor market needs. The Vocational Education Act before 1976 encouraged states to conduct these evaluations and since those provisions seemed to have little effect, the new amendments required it.[13]

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13 U. S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H.R. 12835, p. 38.

Results from the evaluations are to be used to revise programs and a summary of them must be included in the annual accountability report that is submitted to the U. S. Office of Education. Evaluation reports must also be made available to the state advisory council on vocational education in order for them to prepare their own annual evaluation report and in order to better monitor the state board's evaluations (see pages 21-23 for more information on state advisory councils and evaluation).

In hearings before a House subcommittee held in March 1978, some members of Congress expressed concern about the quality of evaluation data that were available.[14] In a period of inflation, youth unemployment and taxpayer resistance, the bottom line on evaluations and the ability to improve programs is whether they can elicit information that can be used to justify expenditures of federal, state and local dollars.

Other uses can, of course, be made of information from state board evaluations of programs. Program improvement and planning are obvious uses of such information. Programs found to have problems can be helped to improve or be discontinued. A strategy for more effective in-service training for teachers can be developed when states know which areas need help. But some people readily point out that when an evaluation system is imposed from outside rather than arising out of felt needs, initially the only use of evaluation is for compliance. Only over time can the evaluations be adjusted to local circumstances and put to some real use. Another individual commented that the evaluation data will be very useful to them if they ever find the time to do something with the information they have obtained. These remarks highlight the need for evaluation to be clearly delineated and its purpose stated as clearly as possible if maximum utility is to be made of the information presented.

Approach/activities. The response of states to the evaluation requirements has been varied. A number of states have been using systematic evaluation schemes for years, some even more extensive than what the 1976 Amendments require. Others are pleased that they have not been evaluating on a larger scale since they might now have to change everything. Still others are happy to have the federal requirements to encourage greater compliance or better documentation. Some are annoyed with the

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14 U. S. Congress, House Hearings before a Subcommittee of the Committee on Appropriations, Departments of Labor and Health, Education and Welfare Appropriations for 1979, 95th Congress, 2nd Session, 1978, p. 340.

requirements and the lack of resources for doing the evaluations, but few question whether they must do them; they generally only question how they will proceed to gain the most value for the effort.

Most states do not have legislated state requirements for the evaluation of vocational education. Consequently, the federal requirements are sometimes taken *in toto* with little regard for whether those evaluations and the policies they may determine are in line with state policies on vocational education.

Many state evaluations of planning and operational processes are designed to assess each program against the background of the local philosophy, goals, and objectives on which the program is founded. An accreditation model of evaluation is often used with a self-evaluation followed by a team visit.

The federal regulations (104.402) have presented a new dilemma--some states have interpreted the *such as* items to mean they can evaluate in terms of just those items that are most appropriate for them, while others are sure they will be held accountable for each and every item. Some states indicate that the regulations go far beyond the legislation while others suggest that the regulations have not gone far enough--they wonder how the resultant data can be aggregated nationally if states are left to select between those items they will use in their evaluations.

While many states feel that trying to measure student achievement is a good idea, few are satisfied with the various means available to do so. Follow-up data are gathered through schools, teachers, or students and range from small samples to total populations.

For extensive information on how the states are responding to the ev tion requirements, see the report, "State of the Art Revie Evaluation Procedures in Vocational Education," prepared by CRC Education and Human Development, Inc. for the National Institute of Education in 1978 (see footnote on page 13).

Problems. Most people in the states agree that the intent of the evaluation requirements is good, but that too much is being asked for too soon. Several states that had developed comprehensive evaluation systems prior to the 1976 legislation agreed that a minimum of three to four years was necessary in order to develop those systems and get them to a point where they were beginning to function well. Perhaps even more time would be necessary in states that are initially responding to

a desire to comply rather than to a perceived local or state need. However, the legislation requires that all programs must be evaluated within five years. A state without systematic evaluations must either spend little time on development in order to distribute the evaluation load more evenly over the remaining years or spend more time on development initially and evaluate more programs at the end of the time period. The desire to comply is strong enough and resources scarce enough that several states acknowledged feeling forced into the former position.

A frequently mentioned problem is the lack of money for evaluation. Some state people mentioned they were having to spend time trying to convince people at the local level that evaluations will bring substantial benefit to them since the money for those evaluations will probably come out of program funds. Evaluation systems cannot remain static, and considerable energy must be used in improving and changing them if program improvement is to be a result. Thus, the costs do not stop once an evaluation system has been developed. Measuring student achievement, as mentioned previously, is a problem for many states because they feel present measures are inadequate but that the cost for any one state to develop them is prohibitive.

States also complain that little consideration has been given to their particular circumstances. For example, personnel in some states feel that process evaluations may be more appropriate and easier to do than product evaluations. States with large populations may have problems doing follow-ups because of sheer numbers, depending on how *program* is defined. States and areas within states with heavy out-migrations have trouble tracing students for follow-up, let alone contacting employers to ascertain their satisfaction with former students. In addition, in those states with a tradition of strong local control of education, state education agencies often have not had the authority to evaluate local programs. Consequently, they often conducted evaluations of local education agencies (LEA's) in response to requests from those LEA's, and statewide systematic evaluations were never developed. Now local and state agencies are having to learn a new way of thinking and relating.

There are other problems as well. States wonder how five-year cycles for evaluation in this legislation can be hooked up with the seven-year cycles for their school accreditation reviews in order to reduce duplication. Few states have ever collected any information on the leavers of programs and they are not sure of how to proceed or what to expect.

Comments. In general, states are making a real effort to comply with the federal evaluation requirements. Simply mandating evaluations, however, does not automatically mean there will be improvements. A follow-up system that works well in one state may not work so well in another. One system may function well because of the extensive work that has been done with local advisory councils and the support that has been cultivated with employers. It may take years for another state to come up to that same level of cooperation and get the same quality of follow-up information. Confusion and uncertainty about the objectives of the legislation that are sometimes seen as incompatible by states--long range program improvement versus the immediate need to be accountable and compliant--make it difficult for them to know where they should concentrate their efforts. Several people commented that more leadership and guidance from the national level would be helpful.

The question still remains, what do state boards of vocational education need to know and do in order to ensure program improvement at the local level? Are they getting that information from the mandated evaluations? It is beyond the scope of this paper to answer those questions, but such questions should be considered by each state before the next revision of federal vocational education legislation is completed.

State Advisory Councils for Vocational Education (SACVE's)

Legislative basis.

Sec. 105 (d)(2) Each state advisory council shall also evaluate vocational education programs, services and activities assisted under this Act, and publish and distribute the results thereof. (3) Each State advisory council shall prepare and submit to the Commissioner and to the National Advisory Council created under section 102, through the State board, an annual evaluation report, accompanied by such additional comments of the State board as the State board deems appropriate, which (A) evaluates the effectiveness of the vocational education programs, services and activities carried out in the five year State plan submitted under section 107 and section 108, including a consideration of the program evaluation reports developed by the State pursuant to section 108, and (B) recommends such changes in such programs, services and activities as may be deemed necessary.

***Sec.** 112 (b)(2) Each state, in formulating its plans **to fulfill** these requirements, shall annually consult with the State advisory council which shall assist the State in developing these plans, monitor the evaluations conducted by the State, and use the results of these evaluations in compiling its annual report required by section 105.*

Regulations implementing this section:

104.93 The State advisory council shall . . .
(c) Evaluate vocational education programs (including programs to overcome sex bias), services, and activities, under the annual program plan, and publish and distribute the results thereof;
(d) Assist the State board in developing plans for State board evaluations under the authority of Sec. 104.401 and monitor these evaluations;
(e) Prepare and submit through the State board to the Commissioner and to the National Advisory Council an annual evaluation report, accompanied by any additional comments of the State board as the State board deems appropriate . . . .

Assumptions/expectations. State advisory councils for vocational education were set up under the Vocational Education Amendments of 1968 to ensure greater lay participation in the planning and evaluation of states' vocational programs. Generally, the advisory councils had only limited impact on state programs, and Congress added various amendments in 1976 in an attempt to remedy problems and to expand the councils' functions. Congress definitely wanted them involved in the entire planning process and in the monitoring process. In order to assure that the advisory councils could perform independent evaluations, Congress included additional amendments in 1976 giving the councils control over their own programming, administration, and funds. It had been difficult for some councils to say negative things about state programs when they were dependent on the state boards for their funds.[15] The advisory councils are generally expected to see that the needs of the states' citizens are being met by vocational education and to see that the state board does what it is supposed to, especially with regard to planning, evaluating and accounting for the distribution of funds. In the past, this function may have been of particular importance in those states whose state boards were not separate entities. One source mentioned that in some states, the administration of vocational education was sometimes lost in state departments of education and the state advisory councils were to help see that certain administrative tasks were not ignored. Although they have no powers of enforcement, councils' recommendations are meant to be taken seriously by the states and are passed on to the U. S. Office of Education and to the National Advisory Council for Vocational Education in annual evaluation reports.

Approach/activities. As might be expected, state advisory councils have responded in many different ways to the mandates. Some do comprehensive statewide evaluations of some very specific things such as sex equity. Some evaluate the state board and their process for evaluation. Others consider how vocational education can be developed and improved in their states. Some

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15 U. S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H.R. 12835, p. 32.

do evaluations that complement the state boards' evaluations while others do spot checks on them. Many advisory council members go on state evaluation visits either as team members or observers. Since some feel that they cannot and should not do technical evaluations, they spend more time holding hearings, performing subjective evaluations and/or working with the state legislatures. Some have contracted for third party evaluations while others have done studies similar to those conducted by GAO. Most focus their evaluation efforts on the total vocational education program thrust in their state.

Problems. Problems seem to stem from different interpretations of words like *monitor* and *evaluate*. Most state advisory councils have good working relationships with their state boards. However, since both agencies have legislated responsibilities for evaluation, conflicts over the charge sometimes do occur. Most councils function primarily in an advisory capacity, but many prefer taking active roles in establishing state policies. Some councils see themselves clearly as advocates while others see themselves primarily as adversaries largely because of their advisory and evaluation roles. The two roles are sometimes conflicting, but some contend that they could not serve in a proper advisory or advocacy capacity if they were not able to evaluate or assess the overall effectiveness of vocational education in their states and thus know what to advise. A few are not clear about their proper roles, and others are attempting to clarify these roles and achieve a working balance.

National Advisory Council on Vocational Education (NACVE)

Legislative basis.

Sec. 162 (b) The National Advisory Council shall . . .
(2) review the administration and operation of vocational education programs under this Act, and other pertinent laws affecting vocational education and manpower training (including the effectiveness of such programs in meeting the purposes for which they are established and operated), make recommendations with respect thereto, and make annual reports of its findings and recommendations (including recommendations for changes in the provisions of this Act and such other pertinent laws) to the President, Congress, Secretary, and Commissioner . . .
(6) conduct independent evaluations of programs carried out under this Act and publish and distribute the results thereof.

It is sometimes difficult for advisory councils to ascertain their own effectiveness and to know where to channel their talents. Several mentioned that they could use guidance on how to more effectively use the information they find in their evaluations.

Comments. While state advisory councils perform worthwhile functions, expectations may be rather high for what they can realistically do. The work some do as coordinating councils may be just as important as what they do in evaluating and advising. Many councils feel that they lack the expertise, authority and finances to conduct evaluations in the technical sense of the word and hope that their interpretation of their mandated responsibilities is the proper one. In many cases they perform assessments rather than evaluations. Councils want to do what is best for vocational education and students in their states, but what is best is not always clear or unanimous. In addition, turnover and commitments to other full-time jobs will always limit the amount of time and energy that can be devoted by members to council activities.

The councils do seem well-suited for assessing how well their state boards have carried out the plans set forth in their five year and annual plans. The biggest issue with regard to council evaluations is that there is no provision for resolving differences when their findings are different from those of the state board. Not that one is necessarily right and the other wrong--but surely there is something to be learned from the discussion and resolution, if possible, of those differences.

Assumptions/expectations. In the House report that accompanied the Education Amendments of 1976, the House Committee on Education and Labor commended the National Advisory Council on Vocational Education and said that it had made itself into one of the outstanding advisory councils in the federal government.[16] They also, however, expressed concern about the way some duties had been performed, particularly those related to evaluation. Even though the National Council had a clear responsibility under the law to evaluate the performance of the Office of Education in carrying out its administration of the Vocational Education Act, the committee found that it had not been as effective as they had desired. By simply mentioning this in the committee report and by not changing that requirement, Congress let it be known that they thought this was an important and appropriate function that should indeed be carried out. The other provision, (6) above, continued to grant them the authority to carry out any kind of evaluation that would be necessary to offer well-founded advice to the President, Congress and others. Congress appears to want objective lay opinion on the nationwide thrust of vocational education from people who are concerned about, but independent of vested interests in vocational education.

Approach/activities. As part of the National Councils' responsibility for reviewing the administration and operation of vocational education programs, they began a two-year study of the Bureau of Occupational and Adult Education (BOAE) in September 1976. Phase I of the study was completed in October 1977 and an interim report entitled *A Study of the Administration and Operation of Vocational-Technical Education Programs* was published in December 1977 by the NACVE Task Force on Administration and Operation of Vocational-Technical Education in the U.S. Office of Education. During Phase I, task force members focused their attention on the Division of Vocational and Technical Education (DVTE - the group that has primary responsibility for the administration of basic grants to the states) within the Bureau. After conducting numerous interviews with state directors of vocational education, professional staff members of the Division and the Bureau, and others, the information from all the interviews and reviews of documents was analyzed and synthesized into the findings published in the interim report. In that report,

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16 U. S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H.R. 12835, p. 31.

the primary problems that personnel in DVTE were encountering that were likely to impinge on their effective and efficient administration of programs and subsequently state operation of programs were identified. Such things as inordinate workloads for program specialists, an inadequate system for the communication, coordination and follow-up of assignments, and the Office of Education's lack of a clear stance regarding vocational education were cited as problems. Task force members are still working on Phase II which is focusing on the degree and quality of programmatic and functional services being made available to the states by the Bureau. A final report will be published when the second phase is completed in early 1979 and should include conclusions and recommendations from both phases.

In addition to the review of administration of vocational education programs, the National Advisory Council is also authorized to conduct studies, hearings and independent evaluations as necessary. While the council does not usually conduct independent evaluations per se, members have participated in the Bureau's Management Evaluation Reviews for Compliance and Quality (MERC-Q, see p. 28) as participating team members on site visits to individual states; conducted hearings on vocational education for American Indians; and contracted for a study on the impact of CETA on institutional vocational education among numerous other activities. The National Council is more inclined to use evaluation as a tool to gather data/information that can be used in providing advice to the President, Congress and others rather than as something that can be used to help bring about compliance or to directly improve programs at the local level. Consequently, while NACVE could conceivably conduct evaluations on any number of things that relate to the national thrust of vocational education, specific evaluations will probably be done only if they are dictated by the subject matter agreed upon in their annual program of work.

Problems. Like any advisory group that must play the roles of both advocate and adversary, the National Advisory Council for Vocational Education is faced with difficult evaluation judgments. In their efforts to improve the vocational education system, they must be concerned with how the information reported in their evaluations is used. Information can be used by those who oppose vocational education as well as by those who want to improve it. Consequently, all potential statements must be weighed carefully by the Council as to their ultimate impact on, and improvement of, vocational education. Some critics contend that the National Council has not taken sufficiently strong positions or fully reported all controversial findings. The Council must be concerned with long run benefits and with providing a basis for improvement.

Resources are a problem for this group, too. Therefore, they have not been able to undertake in-depth, longitudinal studies that might provide information on national trends that would be useful in their advisory capacity.

Comments. It seems most appropriate for the National Advisory Council to keep track of the general federal level administration of vocational education programs funded under the Vocational Education Act. Because its members are concerned, one should expect them to demand the best of vocational education even if it means being critical. No one should expect miracles from such evaluation activities and their resultant recommendations. If the evaluation process is to work well, the organization being evaluated must be both receptive to change as well as capable of changing those things that would result in improved administration and operation. For example, if NACVE were to find that the Bureau of Occupational and Adult Education were grossly understaffed in a particular division, a recommendation that additional positions should be allocated and filled would have little impact if nothing could, in fact, be done about it. Providing thorough documentation and realistic recommendations on the federal level administration of vocational education programs could serve to keep Congress informed about various developments and offset future criticisms. The National Advisory Council is not equipped to monitor the day to day activities in the administration of vocational education and should not be expected to do so.

It is doubtful that the National Advisory Council would ever get involved in evaluations of programs at the local level. Policy research and informal evaluations that provide early insight into problems long before key decisions-making points are reached are two essential evaluation-related areas in which they could make significant contributions.

USOE--Bureau of Occupational and Adult Education (BOAE) - Management Evaluation Review for Compliance and Quality (MERC-Q)

Legislative Basis.

Sec. 112. (a) In order for the Federal government to assist the States in operating the best possible programs of vocational education . . .

(2) the Bureau of Occupational and Adult Education shall, in at least ten States a fiscal year during the period beginning October 1, 1977, and ending September 30, 1982, conduct a review analyzing the strengths and weaknesses of the programs assisted with funds available under this Act within those States; and the Department of Health, Education, and Welfare shall, in the same period, conduct fiscal audits of such programs within those States.

Assumptions/Expectations. The Management Evaluation Reviews for Compliance (MERC's) conducted by Bureau of Occupational and Adult Education (BOAE) staff are designed to assess the degree of state compliance with the Vocational Education Act and its related regulations as well as other federal legislation such as: (a) the Adult Education Act, (b) certain provisions of Section 112 of the Comprehensive Employment and Training Act (CETA), (c) Title IX of the Education Amendments of 1972, (d) Section 504 of the Rehabilitation Act of 1973, and (e) Title VI of the Civil Rights Act of 1964 as they relate to the above legislation. These state-by-state evaluations were begun in March 1976 in direct response to the General Accounting Office's 1974 report that criticized the Bureau for not adequately monitoring the flow of federal funds into vocational education.[17]

The Education Amendments of 1976 added the provision that the Bureau of Occupational and Adult Education must also analyze the strengths and weaknesses of the state vocational education programs being reviewed. The amendments also require the Department of Health Education and Welfare to conduct a comprehensive fiscal audit of each state's program during the same period.

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17 U.S., General Accounting Office, Comptroller General, *What is the Role of Federal Assistance for Vocational Education?*, Report to the Congress (Washington, D.C.: U.S. General Accounting Office, 1974).

Prior to 1976, the Office of Education demanded a great deal of paperwork and detailed data from the states but there was no follow-up on this paper compliance. Vocational education was handled like a revenue sharing program and there was little effort to assist states or to try to correct perceived misuses of federal money. According to the Report from the Committee on Education and Labor, Office of Education officials often did not feel authorized to go into a state to ask how federal funds were being spent. Consequently, the Committee felt compelled to include the above provision. The report stated, *In proposing these amendments, the Committee wants to make clear that it does not believe that the states are squandering these funds or that there are widespread illegalities regarding their use. All we are trying to do is to assure that the best possible use is being made of these funds; and we believe that effective oversight of these expenditures, including monitoring, evaluating, and auditing, are necessary to assure this result.*[18]

Congress is interested in the information that is found in these reviews, but members are also concerned with providing a mechanism that reviews states' compliance with the legislation and holds them more accountable for the expenditures of federal funds. Members of Congress also showed concern about the need to evaluate and improve programs when they included the section on reviewing strengths and weaknesses.

Information from the MERC review is distributed to several parties. Some information goes to Congress in the Commissioner of Education's annual report on vocational education. The data are compared and a few of the most persistent problems in compliance are pointed out. Trends in areas of strength and weakness are also included. An executive summary for each state reviewed is also prepared and submitted to the Office of Civil Rights, the National Advisory Council for Vocational Education, and the Department of Health, Education and Welfare's audit agency.

The process of going through a review and the information that results from it are of greatest use to the Bureau and to the state board of vocational education in the state being reviewed. Reviews may have the following consequences:

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18 U. S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H. R. 12835, pp. 17, 28, 29.

1. Problem areas are determined. This seems to both identify and confirm problems for the states.

2. States usually have a better interpretation of the rules and regulations after going through a review.

3. States usually achieve improved documentation.

4. States learn from their self-evaluation by looking at themselves.

5. BOAE gets a better understanding of the problems facing the states, particularly with regard to (a) the variety of interpretations that can be made of the rules and (b) the state structures into which those interpretations must fit.

6. BOAE learns in what areas states need technical assistance and follow-up.

Approach/Activities. The reviews that the Bureau does (of at least ten states each year) are of compliance based on documentation. They go to the state scheduled for review and give the state board of vocational education the regulations that are to be covered. Six weeks later the MERC team comes back and spends a week checking the documentation and interviewing people. Typically teams have twelve members and include MERC staff, a representative from Adult Education and one from CETA, a National Advisory Council member, a Bureau staff member responsible for overseeing the particular state, and representatives from vocational education and adult education in a state that is scheduled for a review in the near future.

In conducting a review, team members assess the extent to which the state is following its approved state plans, and the degree to which the procedures being followed are consistent with each relevant regulation. For example, four judgements could be made on compliance with any regulation: (1) in compliance, (2) not in compliance, (3) to be determined, and (4) not applicable. *To be determined's* are given when there are changes in the rules and regulations and the state has not yet had time to change and adjust its procedures. When a state is judged not in compliance or its compliance is yet to be determined, team members make recommendations and assign follow-up responsibilities to appropriate Bureau staff. Theoretically, drastic non-compliance could result in the withholding of federal funds. A "Q" for quality was added to MERC when the

Bureau was told to review the *strengths and weaknesses* of vocational education programs. Since January 1978, in addition to reviewing compliance with the regulations, the teams have been reviewing quality of (1) state vocational education planning procedures, and (2) the procedures for the follow-up of completers and leavers of vocational education programs. Modules for reviewing the states' systems for evaluating the accessibility of vocational education programs are being developed and should be pilot tested and in use in the Spring of 1978. A couple of other modules to be used in reviewing the quality of other state procedures will probably be developed sometime in fiscal year 1979. As with the compliance section, the quality review starts with documentation. There is more dialogue and interviewing though, and team members usually try to review the rough draft of their final report with appropriate state people to make sure that they have perceived the state situation and environment correctly. Strengths are identified and recommendations on weaknesses are made in the report, but states do not have to accept any of the recommendations.

At the end of fiscal year 1977, the first twenty-three reviews showed the states were 90 percent in compliance. In fiscal year 1978, the rate was down to 80 percent. There were many more *to be determined's* because of the changes in the regulations and the lack of time for states to change their procedures.

Problems. The problems for MERC-Q are the same ones that anything caught between two administrative systems would face: actions require long, slow processes, paperwork multiples, and issues tend to complicate themselves. States have been cooperative and understand the purpose of the review. Whether all states accept the purposes of MERC-Q as a legitimate process that brings about improvement is not yet known. Follow-up and technical assistance may be more difficult and less personal now that the regional office personnel have been centralized in Washington, D.C.

Comment. The Management Evaluation Review for Compliance and Quality appears to be working fairly well. States seem to have accepted it as a given. Even though state people may feel that the reviews are often too detailed, they also comment that they have been useful. Earlier sharing with all states, information about the regulations to be reviewed and their changing interpretations would be helpful.

It is difficult to know whether these kinds of compliance reviews actually help to improve programs. Oversight hearings may serve as a feedback mechanism to Congress if it turns out that some items or approaches are not as effective or efficient in practice as originally hoped. It should be noted that compliance on paper does not necessarily mean compliance in practice. No state has ever lost its federal funding because of a poor showing in a MERC-Q. Therefore, a question is raised about the incentives for states to do anything more than comply on paper. Continued dialogue between the federal and state level and subsequent technical assistance is needed if meaningful improvement in vocational education is to result.

The presence of National Advisory Council members on the review teams has given them a unique opportunity to observe, assess, and make recommendations on the Bureau's procedures, thus facilitating their quest to review and improve the administration and operation of vocational education programs at the national level. Since the General Accounting Office helped bring the Management Evaluation Review for Compliance and Quality into existence, it would be useful to obtain their comments on the MERC-Q process prior to the next round of vocational education legislation in 1982.

National Institute of Education (NIE)

Legislative Basis.

Sec. 523 (b)(1) In addition to the other authorities, responsibilities, and duties conferred upon the National Institute of Education (hereinafter in this section referred to as the "Institute") by section 405 of the General Education Provisions Act, as amended by this Act, the Institute shall undertake a thorough evaluation and study of vocational education programs, including such programs conducted by the States, and such programs conducted under the Vocational Education Act of 1963, and other related programs conducted under the Comprehensive Employment and Training Act of 1973 and by the State Post-Secondary Commissions authorized by the Education Amendments of 1972. Such a study shall include --

(A) a study of the distribution of vocational education funds in terms of services, occupations, target populations, enrollments, and educational and governmental levels and what such distribution should be in order to meet the greatest human resource needs for the next 10 years;

(B) an examination of how to achieve compliance with, and enforcement of, the provisions of applicable laws of the United States;

(C) an analysis of the means of assessing program quality and effectiveness;

(D) depending on the level of funding available to the Institute, not more than three experimental studies to be administered by the Institute, in cases where the Institute determines that such experimental programs are necessary to carry out the purpose of clauses (A) through (C) and the Commissioner of Education and the Secretary of Labor are authorized, notwithstanding any provision of any other law, at the request of the Institute, to approve the use of grants which educational or other agencies are eligible to receive under such Acts (in cases where such agencies agree to the uses of such grants), in order to carry out such experimental programs;

(E) a review and evaluation of the effectiveness of programs funded under subpart 5 of part A of the Vocational Education Act of 1963 (Consumer and Homemaking Education), *and to make recommendations for the redirection and the improvement of programs at all levels funded under such subpart.*

Assumptions/Expectations. Charles W. Radcliffe, the Minority Counsel to the U.S. House of Representatives' Committee on Education and Labor, said in a presentation in 1977 that *the NIE study is a one-shot* (effort) *for Congressional purposes, to get an independent evaluation of where vocational education is now.*[19] It is clear that the study was intended to provide Congress with objective information to serve as part of the basis for future legislation--particularly in 1982 when the present Vocational Education Act expires.

Congress called for very specific kinds of information: (1) a study of the distribution of vocational education funds, (2) an examination of how to achieve compliance with applicable laws of the United States, (3) an analysis of the means of assessing program quality and effectiveness, and (4) review and evaluation of the effectiveness of consumer and homemaking education programs. The National Institute of Education prepared a plan of study that was sent to Congress in December 1977 in which the plans for these four parts and the specific research projects were outlines. In addition to the specific studies, the plan stated that the undertaking also would result in two products:

> *A description of the vocational education enterprise nationally -- a "fact book" on vocational education -- designed to illuminate sharply the Federal role in it; and*
>
> *A systematic account of the changes in the vocational education enterprise that can be attributed to the Education Amendments Act of 1976.*[20]

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19 John F. Jennings and Charles W. Radcliffe, *Commentary on Legislation Affecting Vocational Education Research and Development*, Occasional Paper No. 27 (Columbus, Ohio: The Center for Vocational Education, 1977), p. 12.

20 U.S. Department of Health, Education and Welfare, National Institute of Education, *A Plan for the Study of vocational Education*, Transmitted to the Congress, December 30, 1977, p. v.

As stated previously, Congress was disappointed with the national information on vocational education available for their use when developing the 1976 Education Amendments. It is difficult to say whether this part of the NIE study is being done with an eye towards being able to take implementation obstacles into consideration when preparing the 1982 Amendments or whether it is a way of helping ensure better implementation and compliance since the very existence of a study may stimulate change.

In any event, Congress felt a great enough need for a thorough evaluation and study of vocational education to provide $4 million for a congressionally mandated study. It appears likely that NIE was chosen to conduct the study because they could respond directly to Congress' concerns; they were knowledgeable about education, evaluation and research; and they would be less subjected to influences by the executive branch and others than other possible organizations. Therefore, their findings would be more likely to be objective and reliable.

It is interesting to note that Congress earmarked a specific percentage of authorized funds for the home economics evaluation. The Education and Labor Committee commented that, *In the past, vocational education research, exemplary and demonstration projects, curriculum, national and state advisory councils have all too often ignored home economics programs as a part of vocational education.*[21] It was their intention that consumer and homemaking education programs would profit from the findings of their mandated study.

The committee was also very emphatic about the dates on which reports should be submitted to Congress. They noted that too many studies were conducted that produced information too late to be of any use to Congress.

While the National Institute's study is being undertaken to fulfill Congressional needs and should play a major role in the reformation of federal vocational education policy and legislation, its findings may also be useful at other levels. At least there are many people in the vocational education and related communities who have high expectations for this study.

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21 U.S. Congress, House Committee Report on Education and Labor, p. 61.

Approach/methodology. Because the NIE study is so extensive this report will only include an overview of their activities. For more details, see their *Plan for the Study of Vocational Education* footnoted above on page 34. The ongoing and planned studies are listed under the four areas specified by Congress.

I. Distribution of Vocational Education Funds

A. Descriptive Study of the Distribution of Federal, State and Local Vocational Education Funds

This study will examine the ways funds are distributed among and used by vocational programs, and the extent to which these expenditures contribute to realizing the purposes of federal policy.

Contractor: University of California, Berkeley
Time Frame: September 1978 - August 1981

B. Meeting the Special Needs of Special Groups

Using information from other studies such as the one above plus doing community case studies, the project will assess the degree to which the needs of special populations are being met.

Contractor: In the process of being chosen
Time Frame: January 1979 - October 1980

C. Projecting Human Resource Needs and Funding Levels and Distributions

This project will attempt to look at vocational education in the larger context of human resources and economics.

D. Simulation Model

In order to simulate the effects of changes in the distribution of vocational education funds at the federal, state and local levels, a prototype model will be designed and tested.

Both C and D are in the early planning stages. Large parts of the work will probably be done within NIE.

E. The Effects of Vocational Education on Participants

By reviewing previous studies and reanalyzing various data banks, this study will attempt to determine the economic and non-economic outcomes of vocational education programs for the participants.

Contractor: In the process of being selected
Time Frame: March 1979 - to be determined

II. Compliance with the Applicable Laws of the United States

A. Studies of State and Local Administrative, Compliance and Evaluation Practices for Vocational Education

This project is extensive since it looks at administration, compliance and evaluation at both state and local levels. Among other things, case studies of practices in 15 states will be done as well as annual reviews and analyses of legislatively mandated state and federal reports.

Contractor: ABT Associates, Inc.
Time Frame: September 1978 - August 1981

B. Analysis of Federal Legal Framework for Vocational Education Policy

This study will focus on the framework within which the federal government administers vocational education programs by examining not only the fit between state and federal legal frameworks but also the congruence between state and federal interpretations of the laws and regulations. The incentives and sanctions in the federal legislation and the federal capacity for implementation of policy (that is, how the various federal agencies relate to state and local education agencies and to each other) will be examined too.

Contractor: Request for proposal has been issued
Time Frame: March 1979 - February 1981

C. Study of Compliance and Enforcement in Selected Federal Grant-in-Aid Programs

The federal experience with compliance and enforcement over the past decade in three other federal grant-in-aid programs will be studied and compared with vocational education.

Contractor: May be done in-house by NIE
Time Frame: Fiscal Year 1979

D. Vocational Education - CETA Coordination

This study will assess the level and effects of coordination and cooperation between vocational education and employment and training programs and identify encouraging and discouraging factors. Information from other on-going studies will probably be used as well as interviews and sample surveys.

Contractor: In the planning process
Time Frame: To be determined

III. Means of Assessing Program Quality and Effectiveness

A. State of the Art Review of Vocational Education Evaluation

This study provides a review of the literature and a report on the ways states are implementing the 1976 Education Amendments evaluation requirements. Problems states are encountering in addition to information on the uses to which evaluations are put are also included.

Contractor: CRC Education and Human Development, Inc.
Time Frame: Completed November 1978

B. Conference on Evaluation

A conference will be scheduled in 1980 to see how states have handled assessments of program quality and effectiveness and to discuss related issues and implications for evaluation in the future.

Contractor: To be determined
Time Frame: Fall 1980

Note: Case studies of evaluation practices are being conducted as part of the ABT project: Studies of State and Local Administrative, Compliance and Evaluation Practices for Vocational Education

IV. Review and Evaluation of Consumer and Homemaking Education (C&HE) Programs

A. A Study of the Responsiveness of the Consumer and Homemaking Education System

This project will address several fundamental concerns of Congress: is the intent of Congress with regard to C&HE programs being carried out, should the present C&HE system be continued, and what, if necessary, can be changed to improve responsiveness? Data will be gathered at the federal, state and local levels. Ten states will be involved, five of which will be in common with the other vocational education studies. Five local sites will also be visited.

Contractor: CRC Education and Human Development, Inc.
Time Frame: September 1978 - August 1981

B. Effectiveness of the Consumer and Homemaking Education Program

The purpose of this study is to provide some understanding of the effects of C&HE courses upon selected groups of learners participating in particular types of programs.

Contractor: This study is still in the planning process and will probably be conducted in-house
Time Frame: To be determined

C. Projecting What People Will Need to Know in 1982 and Beyond to be Intelligent Consumers and Effective Homemakers

A series of papers will be commissioned, analyzing the issues and estimating the kinds of skills, knowledge and abilities different groups of people are likely to need by 1982 and subsequently.

Contractor: Papers will be commissioned by NIE
Time Frame: 1979

Problems. The contractors for the National Institute study may end up doing more original data collection than first expected because of the limitations and delays of other activities such as the Vocational Education Data System (VEDS) surveys (see page 36), which could have supplied useful information. Other problems which the study faces include differences in definitions across states, the ability to aggregate data at the national level across different data bases, time frame required, the lack of readily available data, and coordination of data collection.

According to Dr. Lois-ellin Datta *the initial response of the vocational education field was negative toward having a study at all, toward NIE as the responsible agency and toward its assignment to the Education and Work Groups.*[22] While vocational educators may have opposed the NIE Study originally, today they generally seem much more receptive although some will naturally withhold endorsement until the findings are released and proven to be well-disposed.

Comments. This evaluation is being directed by Henry David. He has been instrumental in gaining more acceptance and greater trust of vocational educators. He is not a vocational educator and is perceived as a neutral but objective investigator. Consequently, Congressional and federal level people have high hopes for the NIE Study and state people are generally less concerned with having to refute the findings of the study and are more inclined to cooperate with and support the NIE efforts. The bulk of the work for this study is to be done within the next three years. The scope of work as specified by Congress is ambitious given the level of resources.

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[22] Lois-ellin Datta, "The New Congressionally Mandated Studies: Notes Toward Species Identification," (Paper prepared for the American Education Research Association annual conference, April 1978), p. 15.

National Center for Education Statistics - Vocational Education Data System (VEDS)

Legislative Basis.

Sec. 161 (a) (1) The Commissioner (of Education) and the Administrator of the National Center for Education Statistics shall, by September 30, 1977, jointly develop information elements and uniform definitions for a national vocational education data reporting and accounting system. This system shall include information resulting from the evaluations required to be conducted by section 122 (b) (as such section will be in effect on October 1, 1977) and other information on vocational --

(A) students (including information on their race and sex),
(B) programs,
(C) program completers and leavers,
(D) staff,
(E) facilities, and
(F) expenditures.

Assumptions/expectations. At the time of the hearings held prior to the enactment of the 1976 Education Amendments it became clear that despite the fact that Congress had mandated evaluation and planning and that states had been required to submit considerable amounts of data to the Office of Education, the information needed for national planning and policy development was still inadequate. Congress wanted and continues to want answers to these questions: Who is being served in vocational education programs? What are they being served? What is being accomplished? And what is the cost? Congress was presented with data that were unable to definitely answer these questions. Generally, the data that states were required to submit to the Office of Education demonstrated compliance with the legislation and justified expenditures and programs. Many states had individually collected more information on vocational education than was required, but because of nonstandard definitions and terminology, data that were useful at the state and local levels could not be aggregated at the national level. Consequently, Congress could not be told specifically which vocational education programs made a difference and which were cost-effective across the nation.

Throughout the hearings, concern was expressed about a need for (1) better accountability of state expenditures of federal funds, and (2) increased state planning that would result in program improvement. It was generally felt that improved data would help both areas. Many witnesses urged the creation of a comprehensive and accurate reporting system. Thus,

Congress required the establishment of a national vocational education data reporting and accounting system, commonly called VEDS.

Congress required that the system be compatible with the National and State Occupational Information Systems (see page 52) and with the Comprehensive Employment and Training Act data system. Congress went on to require that any state receiving money under the Vocational Education Act must supply information required by VEDS and must comply in its reports with the prescribed information elements and definitions.

The Amendments specified that the National Center for Education Statistics be given the responsibility for operating and updating the system since Congress was so disappointed with the administration of data collection by the Office of Education.

It was Congress' intention that VEDS should be a comprehensive system. Requiring that all local and state agencies, in the same manner, begin counting students, programs and staff using standardized terms was an effort to ensure the beginning of better planning. In addition, data could then be aggregated to the national level. Such information would be considerably more useful to Congress than any data previously available.

Members of Congress have long been concerned with follow-up--both in terms of seeing to it that state and local education agencies gathered such information as an indication of program effectiveness and that they then used that information to plan for and improve programs. Requiring that follow-up data on completers and leavers of vocational education programs be included in VEDS was as much a compliance enforcing provision as a straight data gathering one. In addition, Congress would have outcome data available for use in national planning. Some have also viewed VEDS as being beneficial even if it only serves as a onetime measure defining the universe of vocational education.

Eventually, VEDS data could be used at federal, state, and local levels in conjunction with occupational information and possibly result in improved program planning and sounder policies. VEDS could also serve as the primary source of data for other groups once the states had reported it to the National Center for Education Statistics.

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23 U. S. Congress, House Report of the Committee on Education & Labor together with Additional Views, *The Vocational Education and National Institute of Education Amendments of 1976*, 94th Congress, 2d Session, 1976, H. Rept. No. 94-1085 to accompany H.R. 12835, p. 40.

Approach activities. The VEDS staff has worked to accommodate the needs of the various concerned groups and still meet the mandated requirements during the initial planning and development period. Regional workshops have been conducted with state staff to coordinate data gathering activities for school year 1979-1980. The initial survey must include such data as unduplicated counts of the total cumulative enrollment in each program during the reporting year, and counts by sex and racial/ethnic designation for each program. Other information such as unduplicated counts of handicapped student enrollment by handicapping condition, and limited English-speaking ability and disadvantaged students by economic and academic classification will be mandatory requirements in future years.

The first round of data are to be gathered during the 1979-1980 school year. Follow-up data are to be collected in the Spring of 1980 and reported by November 1980.

Problems. VEDS has had many problems from the beginning. The enormity of the task has been underestimated by nearly everyone. Money has been and will continue to be a major problem. A very small staff at NCES has had the responsibility of putting VEDS together. There does not yet seem to be money for analysis, so it remains to be seen whether anything can be done with the data once it is amassed.

The real problem of money, of course, is with the actual implementation by the states. The data requirements for VEDS imply both a student-based and an automated accounting system. While such a system may be valuable to states in the long run, initially it is difficult to implement in small schools or rural areas. Even states with sophisticated management information systems may have to make costly changes because of the requirement to use standardized definitions which may be different from those used previously. And since there are limited funds available for VEDS implementation, program money might have to be used.

The biggest problems for the VEDS staff have been with logistics and clearance. Serving as the primary data gatherer for vocational education has meant trying to make accommodations for the data needs of a variety of groups such as the Office of Civil Rights, the Bureau of Education of the Handicapped, the Urban League and others. Since data must be collected and submitted by the states, clearance through groups such as the required Department of Health, Education and Welfare (HEW), Office of Management and Budget (OMB), and the Chief State School Officer's Committee for Education Information Systems (CEIS) is a difficult and time consuming task.

The VEDS staff has been working to train state staff and to request that state boards submit the necessary data this year since the National Center for Education Statistics has been mandated by Congress to do so. The Office of Management and Budget has given a one year approval to the VEDS forms.

Comments. The Vocational Education Data System has raised several issues surrounding federal and state relations in education. Philosophical questions and governance are two such major issues. The requirements to begin counting people and things at the local level seem quite logical and innocuous. Surely local administrators need such basic information if they are to seriously undertake program planning and improvement. However, such a standardized reporting system may not meet the needs of local and state agencies. What is at issue is the right of the federal government to require such a system that has implications for state and local policies, practices and resource allocations.

The information derived through VEDS could prove to be very useful at all levels. It could, for example, serve as a formative evaluation tool to determine deficiencies in programs. Some state people have become more supportive of VEDS as they have learned how they could use it in statewide planning.

The question arises about the necessity to design the system to count every single vocational education student in this country as opposed to sampling for the desired information. Such a nationwide follow-up system is unprecedented.

National data quality will be limited by the capacity of states to gather and report VEDS information. Some states still hand tally numbers from mimeographed sheets. One state estimates that it would cost three times its total federal grant to implement VEDS. Another figures its data gathering burden will increase more than 400 percent to comply with VEDS. Some states are committed to supporting VEDS and benefiting from its information base and reports.

One final concern expressed by some sources is that VEDS may only document vocational education, not improve it, at least in the short run.

USOE — Office of Evaluation and Dissemination (OED)

1. Vocational Education Equity Study

Legislation Basis.

Sec. 523 (a) The Commissioner of Education shall carry out a study of the extent to which sex discrimination and sex stereotyping exist in all vocational education programs assisted under the Vocational Education Act of 1963, and of the progress that has been made to reduce or eliminate such discrimination and stereotyping in such programs and in the occupations for which such programs prepare students. The Commissioner shall report the results of such study, together with any recommendations with respect thereto, to the Congress within two years after the date of the enactment of this Act.

Assumptions/Expectations. The Committee on Education and Labor held separate hearings on sex discrimination and sex stereotyping in vocational education prior to enacting the 1976 Education Amendments. Evidently the women's groups did an outstanding job of presenting data to Congress because the act includes a whole series of amendments seeking to move state and local education agencies towards greater equity. Since sex stereotyping is a pervasive problem throughout society, Congress was not saying that vocational education was at fault more than anybody else. But it was stating that vocational education does have a responsibility in solving societal problems related to preparation for employment. Witnesses in the hearings concurred that the initiative for overcoming the widespread discrimination and stereotyping in vocational education would have to come through new federal legislation.[24] Consequently, in addition to requiring each state board to designate an employee to coordinate the state's efforts to eliminate sex bias, authorizing the expenditures of funds for the development of non-stereotyped curriculum materials, and making numerous other prescriptive provisions, Congress charged the Commissioner of Education with conducting a study to determine how efforts to eliminate sex bias and stereotyping have succeeded and to report back on the results within two years. The study is as much a reinforcement to see that something gets done as it is a research effort to gather information for further policy decisions.

The design of the study is such that, in addition to providing information to Congress, reports and handbooks with

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[24] U.S. Congress, House Committee Report on Education and Labor, p. 21

information to help reach the goal of sex equity will be developed for federal, state and local use.

Approach/methodology. The Equity Study is sponsored by the U.S. Office of Education's Office of Evaluation and Dissemination in cooperation with the Bureau of Occupational and Adult Education. The American Institute for Research (AIR) is the prime contractor and the firms of Steiger, Fink and Kosecoff, Inc. and L. Miranda and Associates, Inc. are subcontractors to AIR.

The study is trying to provide answers to the following questions: What is the extent of existing inequities? To what extent do inequities exist as a result of policies and practices at the federal, state, local and school levels? As a result of factors in society? How can inequities be eliminated by efforts of the vocational community? How much progress has been made in eliminating inequities? How can progress be monitored?

Literature, legislation and extant data sources were analyzed and synthesized to provide baseline data. State and local surveys were conducted in addition to hundreds of interviews. Thirteen case studies of effective programs are being developed that describe useful procedures so that the same practices can be used in other settings. In addition, instruments and procedures have been developed and will be included in a Replication Handbook that can be used in assessing sex inequity and measuring progress in overcoming it. This study is nearly complete and reports should be out in March 1979.

Problems. According to the project monitor, things went well once they got out in the field -- people were very cooperative. Their biggest problems were with forms clearance -- the process seems to take longer than people anticipate.

Comments. This kind of study may prove to be useful to people at federal, state and local levels in that it seeks to both document the present status/condition of sex equity in vocational education and to identify and feed back information on those things that are working well. However, because the study is dealing with values rather than simply programs, logistics and other external factors, measurable results in program improvement may take a longer period of time before becoming evident than most people would anticipate.

2. Longitudinal Study on Bilingual Vocational Training

Legislative Basis.

Sec. 182 (a) The Commissioner and the Secretary of Labor together shall --

(1) develop and disseminate accurate information on the status of bilingual vocational training in all parts of the United States;

(2) evaluate the impact of such bilingual vocational training on the shortages of well-trained personnel, the unemployment or underemployment of persons with limited English-speaking ability, and the ability of such persons to acquire sufficient job skills and English language skills to contribute fully to the economy of the United States; and

(3) report their findings annually to the President and the Congress.

(b) The Commissioner shall consult with the Secretary of Labor with respect to the administration of this part. Regulations and guidelines promulgated by the Commissioner to carry out this part shall be consistent with those promulgated by the Secretary of Labor pursuant to section 301 (b) of the Comprehensive Employment and Training Act of 1973 and shall be approved by the Secretary of Labor before issuance.

Assumptions/Expectations. The first federal legislation to designate persons of limited English-speaking ability as a specific target population for training was the Comprehensive Employment and Training Act of 1973 (CETA). The Congress felt that many of the thousands of unemployed and underemployed limited-English speakers could also benefit from vocational training. Thus, Part J - Bilingual Vocational Training was added to the Vocational Education Act by the Education Amendments of 1974. The Education Amendments of 1976 retained bilingual vocational training as a separate categorical program since it had barely begun to be implemented and required states to allocate 20 percent of vocational education funds to the disadvantaged and persons of limited English-speaking ability.

The section above that specifies an annual report on the status of bilingual vocational training and an evaluation of the impact of such training was included as much to insure that the Commissioner of Education would address his attention to the programs as to actually provide information to Congress. Clearly it was a priority item and Congress did not want it ignored or lost in the myriad of other programs.

Little is known about people with limited English-speaking ability -- how many are unemployed or underemployed, what kinds of training they could benefit from most, what happens to them as a result of training. Longitudinal surveys were set up for both CETA participants and vocational education trainees. These evaluations should provide a base of information from which progress can be measured over time, as well as providing an analysis of outcome variables. The vocational education study should provide data to Congress that will be useful in making policy decisions. Program improvement at the local level may come about simply because the study is being done.

Approach/Activities. The U.S. Office of Education is sponsoring the Longitudinal Study of Bilingual Vocational Training and has contracted with Kirschner, Inc. to do this mandated evaluation.

A number of projects have been set up since 1974 that provide vocational training through the medium of both English and non-English languages; English language instruction is provided for those who need it. The longitudinal study is examining the effects of this bilingual vocational training on the work experience of trainees. The effects will be measured primarily in terms of changes in employment status and earnings by looking at pre- and post-training labor force participation, employment and wages over time.

A probability sample of approximately 1,000 limited English-speaking trainees was selected from bilingual vocational training classes identified through an inventory conducted during the fall of 1977. Trainees were randomly sampled from each of the 136 training classes in the sample universe and are located in fourteen states. Interviews were conducted with trainees, instructors and program directors. Basic descriptive data on trainees, programs, classes and instructors are also being gathered and tabulated this year.

The first round of interviews has been completed and follow-up interviews will be conducted in spring 1979.

Problems. The major problem this study encountered was finding vocational programs that were truly bilingual as defined in P.L. 94-482.

Comments. As stated previously, this study is as much a compliance-enforcing and monitoring device as it is an improvement-oriented evaluation. Like many studies that focus on hard

outcome data as measured in the labor market, final reports may not be well received by some in the field unless some attempt is made to add some contextual data. Some hope that this study will be continued with future follow-ups so that it could become truly longitudinal and provide data on long-term effects.

3. Models for State Use in Evaluation Vocational Education

While this project was not set up under the Education Amendments of 1976, it was undertaken to provide the framework of an evaluation system which states could use to comply with the evaluation requirements specified for them in that Act (see page 15).

The Office of Evaluation and Dissemination sponsored this project in conjunction with the Bureau of Occupational and Adult Education and contracted with CRC Education and Human Development, Inc. to develop the models.

Within two years, three models -- process, impact and outcome -- were to be developed and field tested. Then a State Evaluation Guide describing the models and how to use them was to be put together for the use of interested states.

This project was cancelled in October 1978 when it became apparent that it was impossible to complete the work with the time and funds available. It is not yet known whether any kind of a report will be issued with the information thus far gathered or whether anyone else will be funded to take up where this project left off.

Groups with Responsibilities Related to Evaluation

There are a number of other groups whose activities may be of interest to the reader, primarily because what they do may have an impact on present and future evaluations. Numerous telephone calls were again made to get a status report on current activities. The particular groups are included to provide a view of the range of activities rather than a comprehensive view.

National Center for Research in Vocational Education

The National Center for Research in Vocational Education was also created under the Education Amendments of 1976. Among numerous other activities the Center is to *work with states, local educational agencies and other public agencies in developing methods of evaluating programs, including the follow-up studies of program completers and leavers required by section 112, so that these agencies can offer job training programs which are more closely related to the types of jobs available in their communities, regions and states* (Sec. 171 (a) (2) (f)). The Ohio State University received a contract to operate the Center for five years, through 1982.

Through all of its services, including those directly related to evaluation, the National Center is intended by Congress to contribute to the improvement of vocational education and make it a more relevant and flexible system of education. The Center is also to serve as a focal point for assisting state and local administrators and educators in developing the expertise needed to conduct evaluations.

During their first year, the Evaluation Division of the National Center focused on providing four states with technical evaluation assistance related to follow-up studies of completers and leavers and special needs subpopulations. Case study reports and handbooks for practitioners are being prepared based on the technical assistance experience. Another project includes providing assistance to the developers of evaluation reports to increase the quality of those reports.

The National Center contracted for a number of papers as part of a state-of-the-art monograph series. The following are directly related to evaluation and should be available in early 1979: Needs Assessment in Vocational Education; Longitudinal Methods for Evaluating Vocational Education; Use of Evaluative Data by Vocational Educators; Impact Evaluation; Data Sources for Vocational Education Evaluation.

The other projects at the National Center that will have an impact on the evaluation of vocational education are *Examining Vocational Education Outcomes and their Correlates* and *Interpreting Outcome Measures in Vocational Education* (funded under a previous contract with NIE).

During 1979 the National Center is proposing to continue providing technical assistance to the four states previously worked with, concentrating on the evaluation of programs for special needs subpopulations. They are also proposing to develop specifications for a longitudinal study of former vocational education students, to determine the correlates of placement rates in vocational education, to continue work on outcome studies and process variables, and to develop more evaluation handbooks. Proposed handbooks include a guide for evaluation by state advisory councils, and examination of the case study approach for evaluating vocational education programs, and some strategies for measuring performance skills.

While the National Center is not one of the many agencies directly involved in evaluating vocational education, the procedures it develops and the services it provides could have a great impact on how evaluation is actually done in the field.

National Occupational Information Coordinating Committee and State Occupational Information Coordinating Committee

The National Occupational Information Coordinating Committee (NOICC) was established under Section 161 (b) (1) of the Education Amendments of 1976. NOICC and representatives of state committees are providing the design standards for the development of an occupational information system. This system is intended to meet the common occupational information needs of both vocational education programs and employment and training programs at the national, state and local levels. The states were given the responsibility for implementing the system and they are setting up state occupational information coordinating committees (SOICC's) to *meet the common needs for the planning for, and the operation of, programs of the state board assisted under this Act and of the administering agencies under the Comprehensive Employment and Training Act of 1973* (Sec. 161 (b) (2)). It is clear that in mandating these committees and allocating funds for their use, Congress was responding to the numerous complaints that states were not planning vocational education programs in the light of current and projected job demand data and other complaints that available demand data were inadequate for planning, particularly at the local level.

NOICC and the SOICC's have the potential for providing a basis for improved program planning as well as bringing together Department of Health, Education, and Welfare and Department of Labor people to agree on coordinated data. Since NOICC and the SOICC's are not primary data gatherers and are seeking to avoid duplication, they are in the position of coordinating and improving the dialogue and cooperation between the various agencies involved in the delivery of education and training services. The plan is to feed occupational supply data into a model from a variety of sources including the Vocational Education Data System (VEDS) and the Comprehensive Employment and Training Act (CETA) programs. Eventually, the system is envisioned to include data on occupational demand and supply based on uniform definitions, standardized estimating procedures and standardized occupational classifications. For the first time, it will be possible to plan training programs from the state level based on a fairly accurate picture of the demand for an occupation and a more complete view of the supply within a state. In other words, planners would be able to look at the total number of people being trained as nurses aides within the state rather than just compare that with projected demand figures before deciding whether to add, subtract, or maintain nurses aide programs. How decisions are to be made regarding which groups should offer which training programs remains to be seen. At least they are beginning to talk.

In the future the state committees may have a great influence on the evaluation of vocational education. Data from the SOICC's could be key in evaluating the planning process and in establishing program goals. As more emphasis is placed on outcomes, the placement of students could be looked at within the context of state and local labor market conditions rather than as simply cold numbers. Local labor markets are both open and in a continual flux, so short run evaluations of placement will never tell the entire story. Placement figures must also begin to reflect such things as whether vocational education graduates displaced other workers. The issues surrounding social good make clear measures of success difficult at best. However, SOICC's should at least begin to provide substantially better data than have previously been available which can be used in the planning and evaluation of vocational education at the state level. SOICC's may eventually help determine which training programs are continued and which are discontinued, while at the same time getting education and human resources personnel to work together.

General Accounting Office (GAO)

The General Accounting Office (GAO), through its reviews of vocational education (see, for example, the reports entitled *Training America's Labor Force: Potential, Progress, and Problems of Vocational Education* issued October 1972, and *What is the Role of Federal Assistance for Vocational Education?* issued December 1974), has had a great impact on the way that the evaluation requirements for vocational education now look. Congress has generally listened to the recommendations made by the GAO, and the vocational education community will be very interested in any other reviews on vocational education the office might undertake. As of this writing, GAO had not yet stated a decision to conduct any additional studies. They will be gathering data to see who is doing what in the ongoing evaluations before deciding if there is a need for them to conduct a self-initiated study or if sufficient information can be obtained from other sources. One of their greatest concerns, of course, is with where the federal dollars are being spent at the project level. The National Institute of Education study on the distribution of funds (see page 36) may address this issue enough to satisfy GAO needs. A decision on whether or not to conduct a study will probably be made in early 1979.

Bureau of Occupational and Adult Education (BOAE)

This is the group within the U. S. Office of Education responsible for the administration of the Vocational Education Act (See Sec. 160 (a)). Many of their activities affect the evaluations done at the state level. They conduct the Management Evaluation Reviews for Compliance and Quality (see Page 28); provide interpretations and policy statements on the federal rules and regulations; review, analyze and approve five-year plans, annual program plans and annual accountability reports; and provide technical assistance to the states. In addition, they are able to contract for studies that will help them in their administrative functions. For example, in the fall of 1978, a small study in nine states was being conducted to ascertain the cumulative data burden on the states in complying with the mandated planning process.

The lack of a permanent Deputy Commissioner (until November 1978) may have limited the Bureau's effectiveness with regard to evaluation since the 1976 Amendments were passed. States need and want guidance that is not restrictive and there is general optimism that things are beginning to improve.

The Coordinating Committee on Research in Vocational Education

Sec. 171 (b) (4) of the Vocational Education Act as amended in 1976 established this committee within the Education Division of the Department of Health, Education and Welfare with membership consisting of representatives from the National Institute of Education, Office of Education and Fund for the Improvement of Postsecondary Education. Representatives from the Bureau of Occupational and Adult Education and the Office of Career Education are also on the committee. This committee is to develop a plan for each fiscal year, establishing priorities for the use of federal funds for vocational education research, career education research, education and work research, exemplary programs, and curriculum development. The committee is also to develop an effective management information system on these projects.

So far the Committee has met once or twice a month primarily to share information and keep abreast of what the others are doing. They have contracted with the National Center for Research in Vocational Education to prepare and publish an annual report and a mid-year update that list the federally-funded projects in progress related to vocational education.

It is hoped that this committee will help eliminate unnecessary duplication of research projects, systematically collect information on research needs and oversee some kind of quality control on research performance. Congress outlined some priorities for research and apparently would like this committee to see that those are followed and that research efforts become more accountable. They may also see to it that research needs related to evaluation are more systematically addressed in the future.

Miscellaneous

There are numerous other efforts that should at least be mentioned. The National Longitudinal Study, the National Assessment of Educational Progress' Career and Occupational Development Survey and the National Center for Education Statistics Class of 1972 study, are ongoing and elicit national information. The National Center for Research in Vocational Education is responsible for gathering together the information that Project Baseline once assembled. That project is called National Vocational Education Needs. In addition, numerous states' research coordinating units (RCU's) conduct or commission studies related to evaluation.

CHAPTER III

IMPRESSIONS/REFLECTIONS/OBSERVATIONS

The reader, by now, may be wondering how, with all these evaluations going on, anyone has time for anything else and whether anyone has an overall conception of how all the evaluations fit together. These are not all of the agencies asking for information. There are accreditation reviews, vocational program approval assessments, and Office of Civil Rights surveys to mention a few. There is a burden placed on state and local education agencies who cooperate in terms of both providing time and resources. These states are hopeful that vocational education evaluations will also provide useful information for program improvement.

While there is general agreement that the intent of the 1976 law is good, it may have been a bit unrealistic or too optimistic. Much of what is going on in the name of evaluation is done in good faith, but it is done to comply. That has as much to do with the state of the art of evaluation as with the manner in which things are evaluated. Doing a follow-up of students and employers does not necessarily tell the local education agency which things need to be changed in order to improve the program. Evaluation, like testing, can affect the priority assigned to tasks. Because much emphasis is placed on follow-up in the legislation, it can be hypothesized that state and local education agencies may choose to concentrate their efforts on building good follow-up rather than on exploring specific ways to improve programs.

Vocational educators are generally realists and many see the importance of evaluation data they are now being asked to collect in relation to the vocational education legislation in 1982. The numerous requirements and lack of funding for evaluation may have the net result of complete compliance but insufficient program improvement. The incentives to do more than comply are not altogether clear. Those states that developed extensive follow-up systems in response to local needs may now have to spend considerable time and money reworking systems to meet the requirements of the Education Amendments of 1976. Money is rarely withdrawn because of poor evaluations. In fact, groups with poor evaluations may be the ones that need assistance most.

The primary purpose of evaluation is program improvement at the local level. And yet concern is expressed throughout the legislation about also being able to use evaluation data to aid decision makers particularly at the federal level. Is it possible that such evaluations can serve the needs of both or either group at the same time?

In reflecting on all of this, more questions surface than answers but they seem to capture some recurring themes.

- Are we reaching a point of diminishing returns with regard to the amount of evaluation "vis-a-vis" program improvement? The cumulative effect in terms of burden and cost may become prohibitive.

- Does anyone know what the real incentives are for compliance?

- To what extent do federal evaluation requirements determine state and local policies?

- Is there any hope for interface among these various groups?

- What provision is there to pull the potentially conflicting results of all these evaluations together into one coherent picture of vocational education?

- How well is what Congress wanted done being translated into reality?

At some point vocational educators at the local, state and federal levels as well as members of Congress, must define their real information needs in order to actually improve vocational education. Questions of accountability must be addressed separately. Until that is done, the ongoing evaluations will be less than optimal and we will continue to have a situation where too much is still not enough.

CHAPTER IV

SUMMARY

The Education Amendments of 1976 included numerous requirements for the evaluation of vocational education. This paper has provided an overview of the requirements and the agencies charged with evaluation activities.

All of the groups are responding to the mandates, some with more enthusiasm than others. Few people question the intent of the evaluations; they sometimes question how to proceed.

There are some fundamental problems, however:

- Many state boards of vocational education feel that they are being asked for too much too soon. They are not always clear about the incentives to comply. It is not known if the methods they use for evaluation will actually help improve programs.

- State advisory councils for vocational education sometimes see their goals as incompatible. Acting as advocates while evaluating the total state program of vocational education is a potential conflict situation. Still, many councils feel that they must have the power to evaluate or assess if they are to offer appropriate and helpful advice. As lay people, they may need technical assistance in order to evaluate.

- The National Advisory Council for Vocational Education has the same conflict as the state councils with regard to evaluation. In addition, its mandate to evaluate is not altogether clear.

- The Management Evaluation Review for Compliance and Quality, conducted by the Bureau of Occupational and Adult Education, does evaluate compliance on paper, but no one is sure if there is a relationship between such compliance and program improvement.

- The National Institute of Education's thorough study and evaluation of vocational education will contribute to a broader understanding of vocational education, but it is ambitious, given the level of funding.

- The Vocational Education Data System being set up by the National Center for Education Statistics has encountered fundamental problems in the area of state and federal relationships. In addition, the scope of a nationwide data system in which everything is counted is difficult to comprehend.

- The studies being conducted by the Office of Evaluation and Dissemination on sex equity and bilingual vocational education are steps toward addressing some major problems in the field.

- The National Center for Research in Vocational Education is able to provide technical assistance directly to only four states with regard to evaluation.

- National and state occupational information coordinating committees that can function well will take years to develop. In some states there is little data presently being gathered that they can coordinate for others to use.

- The General Accounting Office has not provided feedback on how well everyone is proceeding with meeting the mandates.

- The Bureau of Occupational and Adult Education has a leadership role in evaluation which is complex, challenging, and not yet fully realized.

- The Coordinating Committee on Research in Vocational Education is only beginning to function and its full potential is not yet known.

- Numerous other groups are also concerned with evaluation and one can only wonder if figures from one study are ever compared with those from another. At some point the information from all of these evaluation activities must be integrated.

Everyone seems to want a responsive vocational education system that has realistic goals and gets the best results for the dollars spent. With these kinds of objectives, however, goals for vocational education must be more clearly stated and appropriate criteria for measuring success and failure must be established. In addition, duplication must be avoided not only in program offerings but also in evaluation.

Although a system of checks and balances may be useful in order to assure compliance, it may not result in program improvements that are proportional to the dollars and energies expended on evaluation. Many people remain optimistic that the problems

of vocational education are being addressed through evaluation, but question when, or at what point, evaluations create more problems than they solve.

As the different groups mentioned in this paper gain experience and become more aware of each other's evaluation responsibilities, they may find ways to work together to avoid duplication while still remaining in compliance with legislative provisions until/if they are changed. There needs also to be a continuing effort to return the results of evaluations to people at the local level if substantive program improvements are to be made.

The federal government has acted in a leadership role in vocational education since the early 1900s. Because the overall impact of federal influence has been positive, few in the vocational education community have questioned the federal prerogative to demand a great deal in the way of compliance, data and paperwork, despite the fact that over eight dollars of every ten dollars spend in vocational education comes from local and state sources. The majority of vocational educators feel that the evaluation requirements in the Education Amendments of 1976 have been highly beneficial as outstanding efforts have been made across the country to comply with those requirements.

It is clear that Congress mandated strong evaluation requirements because of its real concern with vocational education. Vocational education is indeed beginning to change and improve, but it is difficult to know if the cause is the mandates or a generally changing consciousness. State and local education agencies need to know soon, however, that they are doing the right things and are on the right track if they are to show the kind of improvement that Congress is seeking by 1982.

Few states have formulated comprehensive vocational education policies. As those policies are developed, in the light of incoming evaluation information, it will then be possible to conduct further evaluations in accordance with them. State policies could increasingly become a consideration in the development of federal policies and legislation as that takes place.

As state and national vocational education policies are developed and refined, it will become increasingly possible for the vocational education community to formulate the questions that could and should be asked, and then answered through evaluation efforts.

EPILOGUE

Report of a Conference on Evaluation of Vocational Education

The Education Commission of the States (ECS), in cooperation with the National Center for Research in Vocational Education prepared a paper entitled "Evaluation of Vocational Education: Roles, Responsibilities and Responses of State and Federal Agencies." The paper, which was developed between June 1978 and January 1979, was intended to provide an objective overview of current evaluation activities.

The National Center hosted a conference on the evaluation of vocational education of practioners in vocational education on January 4 and 5, 1979. A draft of the ECS paper was used as a basis of discussion and the group was asked to consider and propose some initial concerns and/or recommendations relating to evaluation. This is a synopsis of two full days of discussion by four executive directors of state advisory councils for vocational education, three state vocational administrators, four state evaluation coordinators, one National Advisory Council for Vocational Education member, one state occupational information coordinating committee executive director, two ECS staff members and two National Center staff members. A list of participants is included in the Appendix.

Participants were asked to share their concerns about the evaluation of vocational education and the group then moved toward formulating recommendations. The intention was to go beyond the usual recommendations for increased funding for evaluation efforts. There was much discussion and debate and wide divergence of opinion--but consensus was reached on at least two items.

- The group expressed its endorsement of the federal role in evaluation. While the evaluation requirements specified in the Education Amendments of 1976 do present problems, there have been significant benefits in understanding, improving, and stimulating vocational education. Federal pressure has helped establish an appropriate priority on evaluation throughout the vocational education system.

- There was strong agreement that a national clearinghouse on evaluation to receive and coordinate data from all ongoing evaluations should be established or designated.

Concerns

Despite having a generally positive feeling about the federal evaluation requirements and the future directions for evaluation in vocational education, individuals within the group also had a number of concerns about evaluation. This section presents those concerns.

Purpose of evaluation. There was fundamental concern about the real and implied purposes of evaluation in the federal vocational education legislation. Not only is there lack of clarity, but there is outright disagreement about the purposes of evaluation. And the purposes appear to be changing over time. Evaluations that exist for program improvement, accountability, compliance, legislative input and/or as an impetus for change, are potentially confusing. If purposes can be clearly stated and agreed upon, systems can be designed to achieve these outcomes.

Relative absence of state-level policy. The lack of coherent state-level policies with regard to vocational education and evaluation was expressed as a concern. The perennial question was raised about the role and relationship of various levels of government--particularly as to vocational education's role as an integral part of education. Since vocational education is a well established system that has been present for over fifty years, the tendency in many states has been to take it for granted as a stable and accepted program not in need of state policy definition or periodic critical review.

Synthesis. Concern was expressed about whether all the evaluation efforts would/could be brought together into a comprehensive and coherent statement about the state of affairs in vocational education. Is there really going to be a nationwide aggregation of data in VEDS (the Vocational Education Data System)? What will happen if the findings of the NIE study, which will go directly to Congress, do not agree with other evaluations such as those done by the National Advisory Council for Vocational Education?

Standards for the interpretation of vocational education's effectiveness. Concern was expressed about the existence and source of standards of effectiveness. Decisions seem to be moving further and further away from the local level. Confusion exists about the appropriateness of relying on placement alone as a measure of vocational education success. Evaluation data are not always viewed as credible. Should any group be expected to evaluate its own programs?

Areas of Need

The discussion produced over twenty five statements that been grouped into five areas of need. As mentioned previously these do not represent group consensus. There was some disagreement about emphasis and wording but these represent general findings.

Need for sharing, updating and technical assistance. The group felt there was a need for help now in several specific areas:

- There is a clear need for a national clearinghouse on evaluation to receive and coordinate data from all ongoing evaluations of vocational education.
- A paper* on the status of evaluation should be periodically updated to reflect changing conditions. Discussion groups should be a part of the overall process of updating the paper.
- A mechanism should be established to provide expanded technical assistance opportunities for states at no cost and independent of compliance review and monitoring activities. Present technical assistance efforts are inadequate and those that must be contracted for are often not fully utilized because of budget limitations/restrictions.

Need to seek alternative evaluation strategies. Because vocational educators now have greater experience in evaluation, they are recognizing the need for the following changes:

- There is a need to develop a broader definition or concept of evaluation.
- Data presentations should be improved so that answers are recognized for what they are.

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*The reader is referred to "Evaluation of Vocational Education: Roles, Responsibilities, and Responses of State and Federal Agencies" which served as the basis of discussion for this meeting. This recommendation reflects the group's view that the paper should be periodically updated and disseminated so that the vocational education community could be kept informed of changing activities in the area of evaluation. Similarly, the group felt that the role it was playing--reviewing and analyzing the paper and developing recommendations based on it--was a valid and valuable contribution that should be continued.

- Evaluations should be expanded to include assessment of the effectiveness of guidance and counseling, teacher preparation, curriculum development, administration and other programs/activities that affect the functioning of the vocational education system.

Need to seek broader, clearer perspective within which to view vocational education. Members of the group acknowledged a continuing need for the vocational education community to address issues related to philosophy and policy.

- Because of the inevitable relationship between evaluation and future policy direction, vocational education is encouraged to enter into philosophical debate on the proper role and functioning of vocational education and its future directions. Also, critics of vocational education should be sought and engaged in constructive debate.

- States must strengthen their efforts to develop comprehensive state level policies/laws on vocational education that can contribute more effectively to a comprehensive national policy for vocational education.

- A national conference should be held in 1980 to discuss vocational education's role in human resource and to arrive at a consensus about future directions.

- Each state board for vocational education should arrive at agreement on appropriate outcomes and what data are needed to measure achievement of these outcomes.

- Outcome data should be viewed within the context of the overall mission of vocational education.

- Data should be presented with candor--in a way that shows the "total picture" with all its constraints and limitations (rather than just the successes).

- Management Evaluation Review for Compliance and Quality (MERC-Q) reports should have a wider distribution at the state level, particularly to state policy makers.

Need to clarify operational responsibilities with regard to evaluation. There are numerous operational matters that need attention including the following:

- State occupational information coordinating committees should be involved in the vocational education evaluation process so they can learn more about state board's data requirements.

- State advisory councils for vocational education and state boards of vocational education should reach agreement on their respective roles and responsibilities with regard to evaluation.

- The Management Evaluation Reviews for Compliance and Quality should be substantive and conducive to overall change and improvement.

- Since the evaluation requirements were enacted by Congress, states have made aggressive efforts to meet federal mandates. It is appropriate to pause and review these efforts, and the evaluation data they have produced, so that needed changes and corrections can be made prior to 1982 when the legislation will be reviewed and amended.

Need to address/resolve pragmatic and efficiency issues. The group discussed a number of very practical concerns that also need attention.

- A task force, or some similar mechanism, should be established to: formulate questions that can be answered with the evaluation information collected to date; to formulate questions that anticipate future concerns/criticisms of the Congress.

- Stronger efforts must be made to assure evaluation information is returned to local education agencies in useful ways.

- The work of the state occupational information coordinating committees should be supported particularly with respect to coordination, collection, and dissemination of information on all vocational education/manpower programs in the state.

- State advisory councils should concentrate their evaluation activities on the evaluation of the states' planning and evaluation processes and the effectiveness of program administration/implementation.

- Legislative requirements for state advisory councils should be changed to "assessment" rather than "evaluation". State Advisory Councils for Vocational Education should be concerned with policy recommendations, not with technical evaluations.

- The Management Evaluation Reviews for Compliance and Quality should be more fully consolidated with Department of Health, Education, and Welfare audits. These audits should be conducted by individuals who are knowledgeable about the requirements of the 1976 Amendments.

- Economic impact statements need to be prepared that reflect the state and local cost of present and proposed evaluation requirements before new evaluation legislation is enacted.

This section has attempted to capture the thinking of some twenty individuals all knowledgeable about vocational education but viewing education from many different viewpoints. The compromise inherent in such a discussion may have created a microcosm which accurately reflects the world in which the system must function. Role definition is always difficult when many actors are given like assignments. It is the hope of those participating in this conference that this paper will be one step in clarifying future activities for the evaluation of vocational education.

APPENDIX

Conference Participants

January 3-5, 1979

State Advisory Council

Harlan Geise, Executive Director
Iowa State Advisory Council for Vocational Education

Chris Szigeti Johnson
Maine Advisory Council for Vocational Education

Mike Latta
North Carolina Advisory Council for Vocational Education

Michael Morton, Executive Director
Maryland Advisory Council for Vocational Edication

SOICC

J. B. Morton
Executive Director, Oklahoma SOICC

NACVE

Caroline Hughes
National Advisory Council for Vocational Education

State Administrators

Norbert Mayer, Assistant Director
Program Planning and Evaluation
North Dakota State Board of Vocational Education

Robert Lynn
Office of Adult and Vocational Education
Georgia State Department of Education

John Klit
Coordinator of Planning and Evaluation
Illinois Office of Education

Evaluation Coordinators

John Roth
Vocational, Technical Division of Research, Planning and Dissemination
Alabama State Department of Education

Barbara Gutheil
Vocational-Technical Education Division
Vermont State Department of Education

Betty Tipton
Kentucky State Department of Vocational Education

Peter Bowen
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ECS

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National Center Staff

Bill Stevenson
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Jerry Walker
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